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Lilian G. Tsang, CA SB #260460  
Chapter 13 Standing Trustee  
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**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF CALIFORNIA**

IN RE:

CRAIG CLAYTON GILMORE

Debtor,

CASE NO. 24-20702

DC NO.: LGT-3

CHAPTER 13 PROCEEDING

MOTION TO DISMISS PURSUANT  
TO 11 U.S.C. §1307

DATE: April 29, 2025

TIME: 1:00 p.m.

PLACE: U.S. Courthouse

501 I Street, 6th Floor

Department B, Courtroom 32

Sacramento, CA 95814

JUDGE: Hon. Christopher D. Jaime

**TO THE DEBTOR AND DEBTOR'S ATTORNEY:**

**YOU AND EACH OF YOU** are hereby notified that Lilian G. Tsang, Chapter 13 Standing Trustee, will move to **DISMISS FOR CAUSE** the above-referenced case pursuant to §1307 of the Bankruptcy Code at the time and place set forth above for the following reason(s):

1. Unreasonable delay by the debtor that is prejudicial to creditors. [11 U.S.C. §1307(c)(1)]
2. Failure to confirm a Chapter 13 Plan. [11 U.S.C. § 1307(c)]
3. Debtor has failed to make payments due under the plan. As of March 11, 2025, payments are delinquent in the amount of \$4,416.00. While this motion is pending, further payments will come due. In addition to the delinquency amount, Debtor must also make the monthly plan payment of \$1,104.00 for March 25, 2025, and the plan payment of \$1,104.00 for April 25, 2025. [11 U.S.C. §1307(c)(4)]
4. A review of Debtor's Schedules A/B and D shows that Debtor's personal property is

1 encumbered. Should the Debtor choose to amend Schedule C exemptions, there would remain non-  
2 exempt equity that may be available for the benefit of unsecured creditors. A more detailed explanation  
3 of the value of the assets is included in the accompanying Declaration. Therefore, the Court may  
4 determine that conversion rather than dismissal is in the best interest of creditors of the estate.

5 **WHEREFORE**, should the Court determine that conversion is not in the best interest of the  
6 creditors, Trustee requests that this case be dismissed. Should Debtors file a Motion to Confirm while  
7 this Motion to Dismiss is pending, Trustee requests the Motion to Dismiss be continued to be heard  
8 with the Motion to Confirm.

9  
10 DATE: 3/11/25

11 /s/ Lilian G. Tsang  
Lilian G. Tsang, Chapter 13 Trustee